



January 18, 2013

*Via Electronic Filing*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Notice of Ex Parte Communication: *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354; *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268

Dear Ms. Dortch:

On January 16, 2013, Larry Alder and Alan Norman of Google's Access Strategy Group met with John Leibovitz, Deputy Bureau Chief, Wireless Telecommunications Bureau, in Washington, DC.

Mr. Alder and Mr. Norman discussed the Commission's recently issued *Notice* proposing changes to the rules that apply to the 3550-3650 MHz band.<sup>1</sup> They expressed desire to have a better understanding of how exclusion zones may be calculated for various incumbent uses in the band. They also noted the importance of ensuring that incumbent services are protected while simultaneously opening the band up for meaningful commercial use.

Mr. Alder and Mr. Norman also discussed the Commission's proceeding to conduct an incentive auction to free up spectrum for mobile broadband uses.<sup>2</sup> In particular, Mr. Alder and Mr. Norman expressed support for a balanced policy expanding both unlicensed and licensed uses in the current broadcast band. In order to implement such a policy, they suggested that in addition to preserving unlicensed access to vacant television channels that remain after repacking, the Commission should make new guard band/duplex gap spectrum available for unlicensed use.

---

<sup>1</sup> *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Dkt. No. 12-354, Notice of Proposed Rulemaking (rel. Dec. 12, 2012).

<sup>2</sup> *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Dkt. No. 12-268, Notice of Proposed Rulemaking (rel. Oct. 2, 2012).

*Google Inc. Ex Parte*  
GN Dkt. Nos. 12-354 and 12-268  
January 18, 2013

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,



Aparna Sridhar  
*Telecom Policy Counsel*  
*Google Inc.*

cc: John Leibovitz (by electronic mail)